



COMMONWEALTH of VIRGINIA
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MEMORANDUM

To: J. Carlton Courter, III
Commissioner of Agriculture and Consumer Services

From: William A. Diamond
Assistant Attorney General

Date: August 6, 2004

Subject: Proposed Amendments to Pesticide Applicator Certification Regulations
(2 VAC 20-51-10 through 210)

At your request, I have reviewed the proposed amendments to Sections 2 VAC 20-51-10 through 210 of the Virginia Administrative Code.

In my view, as counsel to your agency and the Pesticide Control Board, the Pesticide Control Board possesses the statutory authority to promulgate the aforesaid amendments under §§ 3.1-249.30 and 249.52 of the Code of Virginia.